<center>**REMARKS**</center>

By this response, Applicants have amended claims 26, 28, 38, 45 and 50. As a result, claims 26-50 remain pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 26, 27, 30, 34, 35, 38, 41 and 42 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Challenger *et al.* (U.S. Patent No. 6,216,212), hereafter "Challenger." Claims 26-50 are rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Huynh *et al.* (U.S. Patent No. 6,976,656), hereafter "Huynh." Claims 28, 29, 31-33, 43 and 44 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Challenger in view of Lakritz (U.S. Patent No. 6,623,529), hereafter "Lakritz." Claims 36, 37, 39, 40 and 45-50 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Challenger in view of Lakritz.

A. INDICATION OF ALLOWABLE SUBJECT MATTER

The Office has indicated that the specification contains allowable subject matter. Specifically, the Office indicates that the provision for a "translate link type" as detailed in the Specification would be subject matter considered allowable over the prior art if recited in combination with the limitations of the independent claims. Applicants gratefully appreciate the indication of allowable subject matter and have amended claim 28 in an attempt to include some

of the subject matter that the Office deems allowable. Accordingly, Applicants respectfully

submit that claim 28 is allowable as currently constituted.

B. REJECTION OF CLAIMS 26, 27, 30, 34, 35, 38, 41 and 42 UNDER 35 U.S.C. §102(e) OVER CHALLENGER

With regard to the 35 U.S.C. §102(e) rejection over Challenger, Applicants assert that

Challenger does not teach each and every feature of the claimed invention. For example, with

respect to independent claims 26 and 38, Applicants submit that Challenger fails to teach the

abstraction layer of the claimed invention. Specifically, the Office equates the API of Challenger

with the abstraction layer of the claimed invention. In making this comparison, the Office states

that its API specifies what underlying data a cached object depends upon, that the object may be

of several types, and that the underlying structures represent object dependence graphs. Office

Action, pages 2 and 3. Even assuming, *arguendo*, the validity of the Office's point that the data

may be of a variety of types, the underlying file structure that its API refers is uniform, that is the

data is stored in object dependence graph type file structure. To this extent, the APIs of

Challenger do not provide a consistent format to reference objects stored regardless of the

corresponding resource type and a corresponding type of data schema used to store each of the

plurality of source and target content objects.

In contrast, the present invention includes "...managing an abstraction layer that

organizes data for a plurality of source and target content objects using paths having a consistent

format to reference the plurality of source and target content objects stored... regardless of the

corresponding resource type and a corresponding type of data schema used to store each of the

plurality of source and target content objects." Claim 26. As such, unlike the APIs of Challenger, which only reference objects stored in its graph type file structure, the abstraction layer of the claimed invention uses paths having a consistent format to reference a plurality of source and target content objects stored regardless of the corresponding type of data schema used to store each of the plurality of source and target content objects. For example, the claimed invention can provide a common access to objects that are in Windows, Unix, Apple and other proprietary formats using a consistent data organization format. Challenger does not provide this feature. Thus, the abstraction layer of the claimed invention is not taught by the APIs of Challenger. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 26 and 38, Applicants respectfully submit that Challenger also fails to teach a target content object for a destination website that includes content that is a localized version of at least some of the source website that is customized to differ from the source content according to a locale. Instead, the purpose of the cache of Challenger is to propagate data that has been changed on the source to the cache. To this extent, Challenger attempts to achieve a cache in which the content in the cache is identical to the corresponding content of the original source. As such, Challenger never teaches localized content, i.e., content that is purposely customized to differ from the source content. The present invention, in contrast, includes "...a target content object for a destination website that includes content that is a localized version of at least some of the source website that is customized to differ from the source content according to a locale." Claim 26. As such, in the current invention, the target content object of the claimed invention does not merely include content that is identical to that of the source as does Challenger, but rather, includes content that is a localized

version of at least some of the source website. This localized version is customized to differ

from the source content according to a locale. For the above reasons, the cache of Challenger

does not teach the localized content of the claimed invention. Accordingly, Applicants request

that the rejection be withdrawn.

With respect to dependent claims, Applicants herein incorporate the arguments presented

above with respect to the independent claims from which the claims depend. Furthermore,

Applicants submit that all dependant claims are allowable based on their own distinct features.

Since the cited art does not teach each and every feature of the claimed invention, Applicants

respectfully request withdrawal of this rejection.

C. REJECTION OF CLAIMS UNDER 35 U.S.C. §103(a) OVER CHALLENGER IN VIEW OF LAKRITZ

With further regard to the 35 U.S.C. §103(a) rejections over Challenger in view of

Lakritz, Applicants submit that the combined features of the cited art fail to teach each and every

feature of the claimed invention. For example, with respect to independent claim 45, as argued

above with respect to independent claims 26 and 38, Challenger fails to teach or suggest a

destination website that includes content that is a localized version of at least some of the source

website that is customized to differ from the source content according to a locale. Similarly, with

respect to dependent claim 50, as argued above with respect to independent claims 26 and 38,

Challenger fails to teach or suggest means for managing an abstraction layer that organizes data

for a plurality of source and target content objects using paths having a consistent format to

reference the plurality of source and target content objects stored regardless of the corresponding

resource type and a corresponding type of data schema used to store each of the plurality of source and target content objects. Lakritz does not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's other arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserves the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

D. REJECTION OF CLAIMS 26-50 UNDER 35 U.S.C. §102(e) OVER HUYNH

With regard to the 35 U.S.C. §102(e) rejection over Huynh, Applicants asserts that Huynh does not teach each and every feature of the claimed invention. For example, with respect to independent claims 26 and 38 and dependent claim 50, Applicants submit that Huynh fails to teach the abstraction layer of the claimed invention. Specifically, the Office equates this feature of the claimed invention with the software of Huynh that controls each of the computer systems in a distributed system to communication with one another. However, Huynh does not teach that the underlying file structure that its software refers to is not uniform. To this extent, the software of Huynh it not taught as providing a consistent format to reference objects regardless of the corresponding resource type and a corresponding type of data schema used to store each of the plurality of source and target content objects.

In contrast, the present invention includes "...managing an abstraction layer that organizes data for a plurality of source and target content objects using paths having a consistent format to reference the plurality of source and target content objects... regardless of the corresponding resource type and a corresponding type of data schema used to store each of the plurality of source and target content objects." Claim 26. As such, unlike the software of Huynh, which controls communications in a uniform distributed system, the abstraction layer of the claimed invention uses paths having a consistent format to references a plurality of source and target content objects regardless of the corresponding type of data schema used to store each of the plurality of source and target content objects. Thus, abstraction layer of the claimed invention is not taught by the software of Huynh. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With further respect to independent claims 26 and 38 and with respect to independent claim 45, Applicants respectfully submit that Huynh also fails to teach a target content object for a destination website that includes content that is a localized version of at least some of the source website that is customized to differ from the source content according to a locale. Instead, Huynh teaches communicating information intact between computer systems in the distributed network. To this extent, Huynh never teaches localized content, i.e., content that is purposely customized to differ from the source content. The present invention, in contrast, includes "...a target content object for a destination website that includes content that is a localized version of at least some of the source website that is customized to differ from the source content according to a locale." Claim 26. As such, in the claimed invention, the target content object of the claimed invention does not merely include content that is identical to that of the source as does

Huynh, but rather, includes content that is a localized version of at least some of the source website. This localized version is customized to differ from the source content according to a locale. For the above reasons, the messages of Huynh do not teach the localized content of the claimed invention. Accordingly, Applicants request that the rejection be withdrawn.
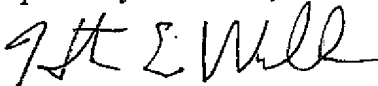
With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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